

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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IN RE: LINCOLN NATIONAL COI  
LITIGATION

) No.: 16-cv-06605-GJP

**DECLARATION OF JEFFREY W. GOLAN IN FURTHER SUPPORT OF CLASS  
PLAINTIFFS' MOTION FOR LEAVE TO FILE A SECOND AMENDED  
CONSOLIDATED CLASS ACTION COMPLAINT**

JEFFREY W. GOLAN, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney duly licensed and admitted to practice law in the State of Pennsylvania and before the United States District Court for the Eastern District of Pennsylvania. I am a partner in the law firm of Barrack, Rodos & Bacine, which has been appointed to serve as the Chair of Plaintiffs' Steering Committee in the above-captioned action.
2. I submit this declaration in further support of Class Plaintiffs' Motion for Leave to File a Second Amended Consolidated Class Action Complaint in the above-captioned matter.
3. Attached hereto as Exhibit A is a true and correct copy of the Second Consolidated Amended Class Action Complaint in *Feller v. Transamerica Life Ins. Co.*, No. 16-cv-01378-CAS (AJWx) (C.D. Cal., filed Aug. 18, 2017).
4. Attached hereto as Exhibit B is a true and correct copy of the Consolidated Amended Complaint of Class Plaintiffs in *In re Conseco Life Ins. Cost of Insurance Litig.*, MDL No. 04-1610 AHM (C.D. Cal., filed Sept. 26, 2004).

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on this 15<sup>th</sup> day of November, 2017.



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Jeffrey W. Golan